

REMARKS

The examiner has maintained the rejections of claims 1 - 20 and 23 under 35 U.S.C. § 102 as being anticipated by IWADE et al. The examiner has rejected claims 21 and 22 as being unpatentable over IWADE et al. in view of JANCEWICZ. Applicants respectfully traverse.

Claims 1, 2, 6, 11, 15, 20, and 23 have been amended to clarify their recitations. No new matter has been added by the amendments, which are supported, *inter alia*, by pages 24, 25, 28, 38, 44, 49, and Fig. 9 of the application.

With respect to claims 2, 6, 11, and 15, it is submitted that IWADE et al. do not disclose texture mapping, particularly, the claimed texture. The claimed texture recited in claims 2 and 15 is limited to a very specific pattern that is not taught or suggested by IWADE et al. The texture recited in claims 6 and 11 requires expression of a blur effect, which is also not taught or suggested by IWADE et al. An example of the claimed texture can be seen in Fig. 9. Thus, it is submitted that claims 2, 6, 11, and 15 are allowable over IWADE et al.

Claims 1, 20, and 23 recite color processing. It is believed that the claimed features are not taught nor suggested in IWADE et al. In response to applicants' previous remarks about the claimed identical saturation and different brightness, the Examiner merely states that IWADE et al.'s models are both solid colors. Brightness is not addressed in the Examiner's comments, nor in the reference for that matter. Moreover, having solid colors (as disclosed by IWADE et al.) does not teach or suggest the claimed having identical saturation. Merely having two solid colors does not mean

they are the same colors, much less the same colors having identical saturation.

Claims 1, 20, and 23 now require determining whether a color of a material of each plane of the contour drawing model and a color of a material of each plane of the first stereo model are identical. When the colors of the materials are not identical, the claims recite setting a predetermined color to an original color of the contour drawing model. When the colors of the materials are identical, the claims recite setting the predetermined color to a new color. IWADE et al. do not teach or suggest such features. Thus, for at least these reasons, it is requested that the Examiner indicate the allowability of claims 1, 20, and 23.

Claims 21 and 22 recite use of outer products. The Examiner has not provided a proper reason to combine the two references. Providing a mathematical tool is not suggested in IWADE et al. Although, JANCEWICZ discloses the well known concept of outer products, there is no teaching in JANCEWICZ of using the outer product to determine whether a plane faces the viewpoint or to determine the back of each plane. Similarly, IWADE provide no reason for or suggestion why to specifically use the outer product (as opposed to some other algorithm) to determine whether a plane faces the viewpoint or to determine the back of each plane. Thus, for at least these reasons, it is requested that the Examiner indicate the allowability of claims 21 and 22.

Dependent claims 3, 4, 7 – 9, 12, 13, and 16 - 18 are also believed to recite further patentable subject matter of the invention and therefore are also believed allowable over the prior art. As such, allowance of the dependent claims is deemed proper for at least the same reasons noted for the independent claims, in addition to


reasons related to their own recitations. Accordingly, applicants respectfully request reconsideration of the outstanding rejections and an indication of the allowability of all of the claims in the present application.

The above amendments have been presented merely for the purpose of clarification, and not to overcome the applied prior art. Accordingly, no estoppel is deemed to result from any of the present amendments.

The present paper is being submitted subsequent to a Final Official Action. Although applicants recognize that entry of the amendment is not a matter of right, it is believed that no new issues have been raised that would require further consideration or search. Thus, entry of the present paper is believed to be proper.

Should the Examiner have any questions, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,
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